



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L8477/2010/2
Licence Holder	SUEZ Recycling and Recovery Pty Ltd
ACN	70 002 902 650
File Number	2010/007005-1~2
Premises	<p>SUEZ Landsdale Resource Recovery Park</p> <p>15 Attwell Street</p> <p>LANDSDALE WA 6065</p> <p>Legal description –</p> <p>Lot 79 on Diagram 57260</p> <p>As defined by the Premises map attached to the Revised Licence</p>
Date of Report	21 August 2020
Proposed Decision	Revised licence granted

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**A/MANAGER WASTE INDUSTRIES
REGULATORY SERVICES**

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L8477 is held by SUEZ Recycling and Recovery Pty Ltd (Licence Holder) for the SUEZ Resource Recovery Park (the Premises), located at 15 Attwell Street, Landsdale.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L8477 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Amendment summary

On 10 July 2020, the Licence Holder submitted an application to the department to amend Licence L8477 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- The removal of Category 13 from the Licence as Category 13 prescribed activities are no longer occurring at the Premises;
- An increase in the annual throughput for Category 62 activities from 85,000 tonnes to 125,000 tonnes per annual period; and
- An update to the Premises name to align with the SUEZ facility naming convention.

The Licence Holder has experienced an increase in the quantity of accepted green waste and council bulk waste collections which has resulted in an exceedance of the current Category 62 annual premises throughput defined in the existing Licence. The increase in the Category 62 annual throughput sought under this amendment application is intended to authorise the throughput that the Premises is currently experiencing and ensure no future non-compliances occur in relation to waste acceptance.

Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
13	40,000 tonnes per annual period	N/A	Removal of Category 13 from the Licence
62	85,000 tonnes per annual period	125,000 tonnes per annual period	The Licence Holder proposes to increase the Category 62 annual throughput to allow for increased waste acceptance at the Premises.

2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the Licence by incorporating changes made under the Amendment Notices as summarised in Table 2.

Table 2: Licences consolidated in this amendment

Instrument	Issued	Summary of approval
L8477/2010/2	15 October 2015	Licence granted
L8477/2010/2	13 October 2016	Amendment Notice 1 Change of registered business name
L8477/2010/2	21 February 2017	Amendment Notice 2 Increase in Category 62 throughput and acceptance of green waste
L8477/2010/2	21 August 2020	Amendment for the removal of Category 13, an increase in Category 62 throughput and a change in Premises name. Consolidation of previous Amendment Notices into Licence.

The obligations of the Licence Holder have not changed in consolidating the Licence. The department has not undertaken any additional risk assessment of the Premises related to previous Amendment Notices.

In consolidating the Licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in Schedule 2 of the previous Licence and advise the Licence Holder to obtain the form from the department's website;
- revised Licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of Licence conditions as they relate to this Revised Licence are detailed in Section 5.1. Previously issued Amendment Notices will remain on the department's website for future reference and will act as a record of the department's decision making.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guidance Statement: Risk Assessments* (DER 2017).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions considered during Premises operation which are relevant to the proposed amendments under this approval are **noise, dust, odour and leachate**. The Applicant has not proposed any additional controls to those currently in place at the Premises which have been

previously assessed under existing approvals.

The Licence Holder has indicated that the exceedance of the current Category 62 annual premises throughput was primarily a result of an increase in accepted greenwaste and bulk waste collections. Increased waste acceptance to the Premises has the capacity to increase the potential of identified key emissions. The Delegated Officer has therefore undertaken a review of condition wording relating to waste acceptance and processing specifications, which reflect current controls in place by the Licence Holder at the Premises, to ensure that condition requirements and current regulatory controls are clearly outlined and enforceable. Details of any updates to condition wording are detailed in the summary of amendments included in Section 5.1 below.

DWER records indicate that no recent complaints have been received relating to the key emissions associated with this amendment application, which includes the time frame where the Licence Holder has exceeded the Category 62 annual throughput on the existing Licence. However, during this period two complaints have been received relating to emissions of windblown waste from the Premises, which could be attributed to the increase in Premises throughput under Category 62. The Delegated Officer has given consideration to the inclusion of Licence conditions relating to emissions of windblown waste as detailed in the risk assessment in Section 3.2 below.

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guidance Statement: Environmental Siting* (DER 2016)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Commercial Premises	Immediately adjacent to Premises
Residential Premises	550 m south of Premises 922 m east of Premises
Environmental receptors	Distance from prescribed activity
Bushforever site 463	700 m north east of Premises
Public drinking water source area – Gnangara underground water pollution control area	1830 m east of Premises
Underlying groundwater - 11.3 metres below ground level	Mapped within Premises area



Figure 1: Premises siting

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IR-T15 Amendment Report Template v2.0 (July 2020)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the Licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L8477 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 62 activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4. Risk assessment of potential emissions and discharges from the Premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of Licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Acceptance, handling and storage of waste	Dust	Air/windborne pathway causing impacts to health and amenity	Commercial Premises immediately adjacent to the Premises	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y	General provisions of the <i>Environmental Protection Act 1986</i> apply	N/A
	Noise		Residential Premises 550 m south and 922 m east of the Premises		C = Moderate L = Rare Medium Risk	N	<i>Environmental (Noise) Protection Regulations 1997</i> apply	N/A
	Odour				C = Moderate L = Unlikely Medium Risk	Y	Condition 7	N/A
	Windblown waste	Potential contamination of stormwater runoff with leachate causing impacts to underlying groundwater	Commercial Premises immediately adjacent to the Premises	N/A	C = Moderate L = Unlikely Medium Risk	N	<u>Condition 4</u>	Complaints received regarding windblown waste emissions indicate that additional regulatory control may be required to contain waste within the Premises boundary
	Leachate		Underlying groundwater mapped within Premises area	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1, 2, 3, 7 and 10	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

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4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Applicant provided draft documents for comment (6 August 2020)	“Waste originating from municipal collections only” has been added to the Acceptance Specification. We accept waste from both municipal sources and commercial and industrial sources, therefore request that this addition to the Acceptance Specification be removed or amended to be “Waste originating from municipal and commercial and industrial collections only”.	Acceptance specification for putrescible and green waste has been updated to ‘Waste originating from municipal, commercial and industrial collections only’ as the Licence Holder has requested.
	The works to decommission the soak well and connection into the wastewater treatment plant have been completed.	Noted – condition referencing decommissioning of soak well has been removed from the Licence.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Summary of Licence amendments

Condition no.	Proposed amendments
N/A Premises name	Premises name updated to SUEZ Landsdale Resource Recovery Park.
N/A Prescribed Premises Category table	Removal of Category 13 and increase in Category 62 annual throughput.
Condition 4	Inclusion of condition relating to windblown waste management.
Condition 5 Waste Acceptance	Condition reworded to standard wording now currently in use by the Department. Inclusion of acceptance specification for putrescible and green waste to improve readability.

Condition no.	Proposed amendments
Condition 7 Waste processing	Table 2 reworded to improve readability. Removal of specification relating to an existing soakwell being sealed.
Condition 13 Monitoring of inputs and outputs	Inclusion of monitoring of greenwaste inputs as not included in previous amendment relating to greenwaste acceptance.
Conditions 3.1.1 and 3.2.1 Improvements	Removal of improvement conditions as these relate to now redundant Category 13 activities.
Condition 18 Annual Environmental Report (AER)	Removal of reference to Schedule 2 as redundant Annual Audit Compliance Report (AACR) has been removed from the Licence.
Condition 19 Notification requirements	Removal of notification requirements relating to Category 13 activities.
N/A Definitions	Insertion and deletion of definitions so as to ensure only definitions relevant to the revised Licence are included.
N/A Schedule 1: Maps	Replacement of Premises map with an updated Premises map.
N/A Schedule 2: Reporting and Notification Forms	Removal of the redundant Annual Audit Compliance Report form.

Table 7: Consolidation of Licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
All relevant	Licensee	Licence Holder	Updated to standard terminology
Conditions 1.1.1 and 1.1.2	Definitions	N/A Definitions section – Table 6	Updated definitions relevant to the revised licence and this amendment
Conditions 1.1.3 and 1.1.4	Reference to Australian standard, guidelines or codes of practice	N/A	Removed and incorporated into other Conditions
Condition 1.1.5	Reference to authorised emissions	N/A	Removed and incorporated into other Conditions

Existing condition	Condition summary	Revised licence condition	Conversion notes
Condition 1.2.1	Operation and maintenance of pollution control equipment	Condition 1	Reference changed and reformatted
Condition 1.2.2	Management of spills	Condition 2	Reference changed and reformatted
Condition 1.2.3	Management of stormwater	Condition 3	Reference changed and reformatted
N/A	Management of windblown waste	Condition 4	Insertion of new condition
Condition 1.3.1 Table 1.3.1	Waste acceptance	Condition 5 Table 1	Updated to standard terminology Incorporation of green waste specifications from Amendment Notice 2 Removal of Category 13 waste acceptance requirements. Increase in Category 62 annual throughput Inclusion of acceptance specification for putrescible and green waste for ease of readability.
Condition 1.3.2	Non-conforming wastes accepted	Condition 6	Reference changed and reformatted
Condition 1.3.3 Table 1.3.2	Waste Processing	Condition 7 Table 2	Incorporation of green waste specifications from Amendment Notice 2 Separation of Table to clearly delineate processing specifications for different waste types. Removal of specification relating to an existing soakwell being sealed.
Condition 1.3.4	Security measures	Condition 8	Reference changed and reformatted
Condition 1.3.5	Signage at entrance to the Premises	Condition 9	Reference changed and reformatted
Condition 1.3.6	Stormwater to be directed to waste water treatment plant	Condition 10	Incorporation of condition from Amendment Notice 2

Existing condition	Condition summary	Revised licence condition	Conversion notes
Condition 2.1.1	Calibration of monitoring equipment	Condition 11	Reference changed and reformatted
Condition 2.1.2	Report on modifications to monitoring	Condition 12	Reference changed and reformatted
Condition 2.2.1 Table 2.2.1	Monitoring of inputs and outputs	Condition 13 Table 3	Inclusion of greenwaste for input monitoring within Table 3
Conditions 3.1.1 and 3.1.2	Improvements	N/A	Removed in line with this amendment as improvements relate to Category 13 activities
Condition 4.1.1	Records	Condition 14	Reference changed and reformatted
Condition 4.1.2	Aware of licence conditions	Condition 15	Reference changed and reformatted
Condition 4.1.3	Annual Audit Compliance Report	Condition 16	Reference changed and reformatted
Condition 4.1.4	Complaints management	Condition 17	Reference changed and reformatted
Condition 4.2.1 Table 4.2.1	Annual Environmental Report	Condition 18 Table 4	Removal of reference to Schedule 2
Condition 4.3.1 Table 4.3.1	Notification	Condition 19 Table 5	Removal of notification requirements relating to crushing and screening
N/A Schedule 1: Maps	Premises map	N/A Schedule 1: Maps	Replacement of Premises map with updated Premises map
N/A Schedule 1: Maps	Site layout	N/A Schedule 1: Maps	Site layout incorporated from Amendment Notice 2
N/A Schedule 2: Reporting and notification forms	Annual Audit Compliance Report	N/A Schedule 2: Reporting and notification forms	Annual Audit Compliance Report template removed as now redundant. New template is available on the Departments website.
N/A	N1 Notification form	N/A	Reference changed and reformatted

Existing condition	Condition summary	Revised licence condition	Conversion notes
Schedule 2: Reporting and notification forms		Schedule 2: Reporting and notification forms	

References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
Application type					
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L8477/2010/2		
		Relevant works approval number:		N/A	<input checked="" type="checkbox"/>
Date application received		10 July 2020			
Applicant and Premises details					
Applicant name/s (full legal name/s)		SUEZ Recycling and Recovery Pty Ltd			
Premises name		SITA Australia Pty Ltd			
Premises location		15 Atwell Street Landsdale WA 6065			
Local Government Authority		City of Wanneroo			
Application documents					
HPCM file reference number:		2010/007005-1~2			
Key application documents (additional to application form):		N/A			
Scope of application/assessment					
Summary of proposed activities or changes to existing operations.		<u>Licence amendment</u> Removal of Category 13 from the Licence. Increase the limit for Category 62 operations from 85,000 tpa to 125,000 tpa. Update the premises name to 'SUEZ Landsdale Resource Recovery Park'			
Category number/s (activities that cause the premises to become prescribed premises)					
Table 1: Prescribed premises categories					
Prescribed premises category and description		Proposed production or design capacity		Proposed changes to the production or design capacity	
Category 62: Solid waste depot		125,000 tonnes per annual period		Increase from 85,000 tonnes per annual period	
Category 13: Crushing and screening		Removed from Licence		Removal of 40,000 tonnes per annual period	
Legislative context and other approvals					
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Referral decision No: Managed under Part V <input checked="" type="checkbox"/> Assessed under Part IV <input type="checkbox"/>	

Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: DA2013/973 Expiry date: N/A
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office:
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A Date of classification: N/A